

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

Ardena Y. Starks

Debtor(s)

:
:
:
:
:

Case No.: 20-13580-elf

Chapter 13

**RESPONSE OF DEBTOR TO THE MOTION FOR RELIEF OF
AUTOMATIC STAY FILED BY PENNSYLVANIA HOUSING FINANCE
AGENCY**

COMES NOW, Debtor, Curtiss N. Ayers, hereinafter referred to as "Debtor," by and through their undersigned Counsel, Brad J. Sadek, Esquire, and in response to the Motion for Relief filed by Lakeview Loan Servicing, "Movant", and hereby avers the following:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Denied. By way of further response, a complete post-petition payment history is respectfully requested.
7. Denied.
8. Denied.
9. Denied.

WHEREFORE, based on the aforementioned, Movant shall be denied an Order modifying the Automatic Stay under Bankruptcy Code Section 362.

Respectfully submitted,

Dated: February 11, 2021

/s/ Brad J. Sadek, Esq.
Brad J. Sadek, Esq.
Attorney for the Debtor
Sadek & Cooper
1315 Walnut Street, #502
Philadelphia, PA 19107
(215) 545-0008